

Ms. Sharon Peterson
Sr. Environmental Analyst
Associated Electric Cooperative, Inc.
2814 S. Golden Avenue
Springfield, MO 65801

RE: New Source Review Permit Applicability- Project Number: 2016-01-004
Installation ID: 143-0004

Dear Ms. Peterson:

Your request for a determination of permit need for two seasonal heaters at the AECI – New Madrid Plant was reviewed by my staff. According to Missouri State Rule 10 CSR 10-6.061, *Construction Permit Exemptions*, **no construction permit is required** from the Missouri Air Pollution Control Program.

According to your email dated October 1, 2015, you are planning to rent two fuel oil-fired heaters every year during the winter season for the purpose of preventing the lower areas of the Unit 1 and Unit 2 boilers from freezing. The size of the two heaters are 2.4 MMBtu/hr each. Potential emissions from the heaters were calculated using emission factors from AP-42, Section 1.3, “Fuel Oil Combustion”, May 2010 and are listed in Table 1. Emissions of all regulated pollutants are expected to be below the significance levels in Missouri State Rule 10 CSR 10-6.061(3)(A)3.A. Therefore, no construction permit is required for this project

Table 1: Project Emissions Summary

Pollutant	Insignificance Levels (lbs/hr)	Project Emissions (lbs/hr)
PM ₁₀	1.0	0.07
NO _x	2.75	0.69
SO _x	2.75	2.47
VOC	2.75	0.01
CO	6.88	0.17
HAPs	Note 1	0.002

Note 1: 0.5 lbs/hr or the hazardous emission threshold level established by the air pollution control program, whichever is less, for each individual hazardous air pollutant (HAP). The individual HAP emissions are not expected to be greater than their respective exemption levels.

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Please be aware that the National Emission Standards for Hazardous Air Pollutants Title 40 CFR 63 (MACT), Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters* may apply to your equipment. You will need to assess whether the heaters fall under the definition of “temporary” which are exempt. You are also obligated to meet all applicable air pollution control rules, Department of Natural Resources’ rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.045 *Open Burning Requirements*, 10 CSR 10-6.165 *Restriction of Emission of Odors*, 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.261 *Control of Sulfur Dioxide Emissions* and 10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources’ personnel upon verbal request. If you have any questions regarding this determination, please contact Susan Heckenkamp at the Department’s Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
Permits Section Chief

KBHshl

c: Southeast Regional Office
PAMS File: 2016-01-004